

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

Case: U.S. v. Live Nation Entertainment, Inc.

Case No.: 24-CV-3973 (AS)

Presiding Judge: Honorable Arun Subramanian

Date: March 10, 2025

**RE: Notice of Relevant Evidence – Plaintiff’s Rule 11 Warning and Tacit Admission
Regarding Roc Nation LLC Obstruction**

Dear Judge Subramanian:

I, **William Grecia**, Plaintiff pro se in the related matter **Grecia v. Roc Nation et al. (1:25-cv-01484, SDNY)**, respectfully submit this **Notice of Relevant Evidence** to inform this Court about critical developments significantly affecting the case at bar.

I. Recent Actions Taken (March 1–7, 2025):

1. Plaintiff served upon Roc Nation LLC and their counsel, Attorney Alex Spiro (Quinn Emanuel Urquhart & Sullivan LLP), a formal **Tacit Admission Letter**, clearly outlining Roc Nation's continued withholding of over nine figures in Regulation E funds illegally withheld since 2021.

2. Plaintiff explicitly informed counsel Alex Spiro of obligations under the **ABA Model Rule 3.3 (Duty of Candor)** and provided a clear **Rule 11 warning** regarding sanctions for continued deliberate silence and non-compliance.
3. Despite explicit warnings and clear legal obligations under **Federal Regulation E**, Roc Nation LLC and their attorney, Alex Spiro, remain non-responsive, thereby constituting a deliberate **Tacit Admission (Federal Rule of Evidence 801(d)(2)(B))** of their wrongdoing.

II. Legal Implications and Impact on Present Case:

- Roc Nation's continued silence is an admission that funds in excess of nine figures were unlawfully withheld in direct violation of federal financial regulations.
- This conduct demonstrates a **pattern of obstruction, financial misconduct, and bad faith litigation tactics**, directly impacting their credibility and ethics before this Court.
- Attorney Spiro's conduct violates multiple ABA ethical standards, notably **Rule 3.3 (Candor to Tribunal)** and **Rule 11 (Sanctions)**, warranting this Court's immediate attention.

III. Attached Exhibits for the Court's Record:

- **Exhibit A:** Plaintiff's **Final Rule 11 Warning** and Tacit Admission Letter, served March 7, 2025, explicitly warning Roc Nation LLC and Attorney Alex Spiro of immediate sanctions for further non-compliance.

II. Relief Requested from This Court:

Plaintiff respectfully requests Judge Arun Subramanian formally acknowledge this evidence by:

1. Entering this notice and attached Exhibit (Tacit Admission Letter & Rule 11 Warning) into the official record of case **24-CV-3973 (AS)**.
2. Considering this documented ethical misconduct, deliberate obstruction, and regulatory violations in current litigation, including evaluating remedies, sanctions, or judicial interventions deemed appropriate.
3. Coordinating necessary judicial and federal investigative actions, ensuring regulatory compliance and protection of federal judicial integrity.

Conclusion & Immediate Request: The evidence presented herein underscores Roc Nation's ongoing misconduct and violation of federal laws and ethical standards. Plaintiff urges this Court's immediate attention and action to uphold judicial integrity and compliance with federal regulations.

Plaintiff remains available for further court inquiries or hearings.

Respectfully submitted,

/s/William Grecia/

Plaintiff, Pro Se (Case No.: 1:25-cv-01484, SDNY)

EXHIBIT



Grecia Family <business@greciafamily.estate>

4 Motion Submission 1:25-cv-01484

Grecia Family <business@greciafamily.estate>

Sat, Mar 1, 2025 at 1:08 AM

To: Bonny.Sweeney@usdoj.gov, dperez@rocnation.com, alexspiro@quinnemanuel.com, mheller@doc.gov

William Grecia
(212) 256-1666
Plaintiff

Roc Nation LLC
540 West 26th Street
New York, NY 10001
Attention: Legal Department / Counsel Alex Spiro

Re: Formal Notice of Tacit Admission Regarding Embezzled Funds

Dear Roc Nation LLC,

This letter serves as a formal acknowledgment of your continued silence and failure to respond to multiple explicit allegations I have presented concerning the embezzlement and misuse of my funds, totaling in excess of 9 figures.

Specifically, on multiple prior occasions, I have directly notified Roc Nation and its legal representatives in writing of clear and documented accusations of embezzlement, misappropriation, and fraudulent misuse of these funds. Despite ample opportunity and reasonable time, Roc Nation has notably failed to issue any denial, rebuttal, or clarification regarding these serious and criminal allegations.

Under applicable law, including but not limited to the evidentiary doctrine of Tacit Admission (Adoptive Admission), Roc Nation's persistent silence and refusal to formally deny or clarify these allegations, despite multiple formal notices, constitutes an implied acknowledgment and admission of the accuracy of the accusations made against your organization.

This letter is intended to clearly document:

My ongoing good-faith attempts to resolve this matter amicably and at safe distance from known past plots of fatal harm.

Roc Nation's consistent and deliberate choice not to respond, thus establishing clear evidence of Tacit Admission.

Should Roc Nation choose to continue this approach of non-response, this letter and all related correspondence will be presented to the Court as further evidence of your organization's acknowledgment and acceptance of these serious allegations.

Please be advised accordingly.

Sincerely,

/s/William Grecia/
Plaintiff, SDNY Litigation

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